

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: KAREEM RAY SENISES,	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
KAREEM RAY SENISES,	:	
Respondent	:	CASE NO. 1-23-bk-00736-HWV

TRUSTEE'S OBJECTION TO THE AMENDED CHAPTER 13 PLAN
FILED ON MARCH 4, 2025

AND NOW, this 17th day of March 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid.
 - b. The Plan is ambiguous as to the payment. It is unclear if the arrears to Amerisave Mortgage Corp. are to be paid via Trustee or directly via a sale.
2. Trustee provides notice to the Court as to the ineffectiveness of Debtor's Chapter 13 Plan for the following reasons:
 - a. The Plan is incorrectly labeled as the Third Amended Plan. It should be labeled as the Sixth Amended Plan.
 - b. The amount of the legal fees to be paid via the Plan should total \$4,501.00, not \$5,000.00. The fees were initially \$3,501.00 via the Plan and one modified Plan was previously approved, plus this Plan.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 17th day of March 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Leonard Zagurskie, Esquire
Law Office of Leonard Zagurskie, Jr.
110 West Main Avenue
1st Floor
Myerstown, PA 17067

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee